

Exhibit 2

In The Matter Of:

*Shawn J. Tardy, et al. vs.
Martin J. O'Malley, et al.*

*Daniel Webster, ScD.
January 17, 2014*

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1 fired there.

2 A They were -- they were semi-automatic
3 pistols.

4 Q Does that complete your experience handling
5 and firing firearms?

6 A Yes.

7 Q Is it fair to say that, at least, to your
8 recollection you have never handled and fired any of
9 the banned long guns that we're here to talk about
10 today?

11 A That's correct.

12 Q And is it fair to conclude that you
13 wouldn't consider yourself expert in firearms in that
14 way?

15 A In -- in terms of knowing the -- how each
16 one sort of feels in essence when -- when you fire
17 them, that's correct.

18 Q All right.

19 A Because I don't have that direct
20 experience.

21 Q Are there any guns in your household?

1 Q All right. Is there a field for -- well,
2 let me start.

3 What is the database that this data
4 reflects?

5 A This is data on incidents identified by
6 Mother Jones through, principally, news accounts of
7 incidents in which four or more people were killed with
8 a firearm in a public place by a lone shooter.

9 Although the lone shooter, I subsequently
10 discovered is not always the case in, at least, a
11 couple of these.

12 Q All right. How many cases are reflected in
13 this data?

14 A Incidents?

15 Q Yes.

16 A I don't know off the top of my head, but I
17 can -- I think I might have put it in the report. I'm
18 sorry. I know it's in here. Sixty-two, yes, 62.

19 Q And of those how many involved assault
20 weapons have been banned by the State of Maryland?

21 A I don't know for sure.

1 Q Can you even hazard a guess?

2 A The information provided in this database
3 wasn't always complete on some of them, so I'm not
4 certain.

5 Q Well, when I went through and looked at
6 them I only found five or six, do you have a different
7 number when you look at it?

8 A That's -- that's probably close. Um,
9 others, you know, involve guns with large-capacity
10 magazines.

11 Q Well, let's just focus on so called assault
12 rifles for a moment?

13 A Sure.

14 Q Let's assume it's approximately five or
15 six, and there's some confusion about what exactly is
16 within the definition in Maryland, but let's assume
17 it's five or six; is that a disproportionate
18 representation of assault weapons in this data base of
19 mass shootings?

20 MR. FADER: Objection.

21 A Disproportionate, um, it would all depend

1 you know, about the most extreme anti-social act one
2 can think of, okay. So you -- you -- you have
3 variability in the weapon that they choose and,
4 although they all are trying to do mass harm.

5 Q In your report you start out on Page 2 in
6 talking about the design and capability of firearms and
7 I believe this focuses very specifically on the issue
8 you just talked on, am I correct?

9 A Yes.

10 Q Did you do any original research for your
11 report?

12 A Principally the only thing I did was
13 examine the trends just to get an understanding of the
14 general temporal pattern for the number of incidents
15 and the number of individuals shot or killed in public
16 mass shootings, that's -- that's the lone analysis that
17 I did. As well as drawing upon available research.

18 Q And when you talk about the trends that you
19 studied would that be the Mother Jones database?

20 A Yes.

21 Q Okay. You would agree with me that of all